

Vulcan CHEMICALS

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A BUSINESS GROUP OF
VULCAN MATERIALS COMPANY

JOHN A. HEILALA
PRESIDENT
CHLORALKALI BUSINESS UNIT

June 21, 2001

The Honorable Christine Todd Whitman
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Administrator Whitman:

This is in reply to your letter of May 3 1,200 1 concerning EPA's Voluntary Children's Chemical Evaluation Program (VCCEP). Vulcan Chemicals will be participating in this program, through two separate consortia to which we belong.

The Halogenated Solvents Industry Alliance (HSIA) is sponsoring testing for trichloroethylene and perchloroethylene in the VCCEP pilot program, on behalf of Vulcan and other **HSIA** members who also produce or import these products. HSIA will sponsor toxicology testing consistent with Tier I and higher Tier levels of this program. Upon completion of these studies HSIA will assess the need for additional hazard data. This will include development of hazard, exposure, and risk characterizations of these chemicals as necessary to meet the guidelines outlined in the VCCEP, and which meet Vulcan's product stewardship requirements for product testing.

Also as part of the VCCEP pilot program, the American Chemistry Council's Vinyl Chloride Health Committee has committed to sponsor testing for ethylene dichloride, a product manufactured by Vulcan. This commitment will be met in part through toxicology testing consistent with Tier I or higher Tier levels sponsored by the Hazardous Air Pollutants (HAP) Task Force, of which Vulcan is a member. Upon completion of this testing the Vinyl Chloride Health Committee will assess the need for additional hazard data, and will develop a hazard, exposure, and risk characterization of this chemical to meet VCCEP guidelines — also consistent with Vulcan's product stewardship requirements for product testing.

Additional details of the testing protocols and timelines for both consortia representing Vulcan and other companies will be provided to you in separate letters from the Halogenated Solvents Industry Alliance and the American Chemistry Council's Vinyl Chloride Health Committee.

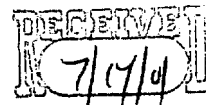
Sincerely,

VULCAN CHEMICALS

John A. Heilala
President

- c. Fred Webber, American Chemistry Council
Steve Risotto, Halogenated Solvents Industry Alliance
Paul Dugard, Halogenated Solvents Industry Alliance
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